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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY REDIRECTED FROM WITNESS WILLIAMS (APWU/USPS-T1-28)

The United States Postal Service hereby files its response to the above - identified interrogatory of the American Postal Workers Union dated February 17, 2012. The interrogatory has been redirected from witness Williams to the Postal Service for an institutional response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY REDIRECTED FROM DAVID WILLIAMS

APWU/USPS-T1-28 One page 6 of the aforementioned webinar presentation, it states that BMEU will not change in the near term.

- a) Please define "near term" in this context?
- b) Some AMP summaries indicate that business mail acceptance may move to another local office (for example, see the summaries for Asheville, NC November 16, 2011 revised, Beaumont, TX December 19, 2011, Brockton, MA December 23, 2011, Cincinnati, OH November 14, 2011, Columbus, GA October 21, 2011.) Will these moves only take place after "the near term"?
- c) What factors determine whether or not a BMEU will remain at the facility or be moved?

RESPONSE

- a) Please see the responses to NAPM/USPS T7-1(a) and T7-7(a). Near term can be interpreted as referring to the mail processing consolidation transition period which will vary by facility depending upon the disposition of the facility where the BMEU is co-located. Mailers will be given 120 days notice and, when reasonable options are deemed to be available, the distance to the new facility from the prior location should not exceed 10 miles.
- b) Yes.
- c) Please see the responses to NAPM/USPS T7-1(a) and T7-7(a).